

EXHIBIT

B

Papendick Deposition,
Case 1:17-cv-13581-TLL-PTM
ECF No. 112-39 filed 11/15/19
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Keith Papendick, M.D.
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1 Waters; is that correct?

2 **A I never saw him.**

3 **Q But you were -- you remember receiving 407 requests**
4 **regarding his treatment?**

5 **A Just from review.**

6 **Q Just from review here recently?**

7 **A (Nodding). Uh-huh.**

8 **Q Some of the other deponents have characterized his case as**
9 **complex or complicated. Would you agree with that?**

10 **A All burns are complicated.**

11 **Q Did you ever have anyone at Duane Waters Hospital before**
12 **that you're aware of with such extensive and severe burns?**

13 **A I have no way of knowing that.**

14 **Q I'm asking about within your recollection.**

15 **A I didn't take care of him directly. I don't provide patient**
16 **care.**

17 **Q But you did make decisions with regard to outside**
18 **consultation and treatment, correct?**

19 **A Correct.**

20 **Q And do you recall having either treated or been the**
21 **Utilization Unit Manager involved in any other cases with**
22 **such severe and extensive burns?**

23 **A Ma'am, I manage about 2,000 407s a month, so for me to**
24 **remember all 407s is an assumption that can't be made.**

25 **Q I'm not assuming that you recall all. I'm just asking if**